

Subject: RE: CPRA request (ICEFPS.2019.07.12.a)
From: "Erica B. Klein" <eklein@hkschoollaw.com>
Date: 12/27/19, 12:53 PM
To: [REDACTED]
CC: Richard Hansberger <rhansberger@hkschoollaw.com>

[REDACTED]

My offer to mail you responsive documentation was to endeavor to provide you responsive documentation sooner rather than later. Despite your continued display of disrespect and unprofessionalism, this office has continued to be cooperative with you. While you do have a physical address, several in fact, all which can be easily located using the internet, as a show of respect in inquired as to your mailing address so as not to be presumptuous that you would willingly receive mail without invitation.

[REDACTED], your preoccupation that your intellect and interpretation of law surpasses that of anyone else, specifically those of my office and that of my client(s) is unfounded. We are well aware of what the law requires. We are also profoundly aware of the requirements under FERPA as well the limited funds, resources and time available to our client, a non-profit public benefit corporation. So, take a moment to attempt to show a modicum of respect. The offer was merely an offer [REDACTED] There was no ill intent; And certainly, no need for your condescension and rudeness. Your construal of every communication as a deliberate effort to avoid legal obligations is blatantly self-serving. Further, the scope and breadth of the initial request appears a deliberate misapplication and use of the public records act in violation of the spirit of the law. Such actions seem counter-intuitive to past arguments you've asserted against other governmental agencies. You have information you seek, fine, but you will do so respectfully, and with the understanding that the organization is a public school and their first priority is to the students.

It seems necessary we, or rather I, push *re-set* in order to tame the fictitious dispute you have created between you and my client (and my office). There has never been an issue with providing information [REDACTED], we're merely protecting student information. My client does not return from Winter Break until the week of January 10, 2019. I will do my best to obtain a link to the FERPA compliant responsive information as soon as possible, however, as I am not privy to the return date of my Client's IT department, I cannot guarantee your digital copy on a date certain until after my Client returns to Spring Session.

Happy [REDACTED] Year.

Regards,

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